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11 September 2020

Attention: Department of State Growth
Tasmanian Government

By email: renewableenergy@stategrowth.tas.gov.au

Dear Minister Barnett,

Draft Tasmanian Renewable Energy Action Plan 2020

Thank you for the opportunity to provide feedback on the *draft Tasmanian Renewable Energy Action Plan* (the **Plan**), released in May 2020.

Formed in 2003, Epuron is an Australian-owned developer of wind and solar projects. The total capacity of wind projects originated by us and now operational is just under 600MW. We expect to see an additional 1GW of Epuron-developed wind capacity enter construction before the end of 2021. A total of 260MW of solar projects originated by us is operational.

Epuron has been assessing Tasmanian development opportunities since 2008 and began active development of renewable energy projects in 2014. Having identified various high-potential sites, we are now engaged at 4 locations in working with landowners and the community, with local and national planning processes, in measuring the wind and evaluating connection options (more information is provided in the 'Background' attached to this letter).

Epuron applauds the vision of the Tasmanian Government in creating the Plan, embracing the great opportunity to grow the State's economy significantly and boost its attraction as a destination for investment, for industry and business and the jobs and economic growth they will bring.

Creating the right investment environment and the confidence investors need requires zeal and commitment over the long term because of the scale of investment required. Legislation of the proposed targets is therefore a welcome approach.

The Draft Tasmanian Renewable Energy Action Plan 2020

The development of the Plan is timely, coming to fruition as Tasmania is presented with massive opportunities to attract energy-intensive industry, to increase its already large role in the National Electricity Market and as the world deals with the social and economic disruption of Covid-19.

As an experienced investor and developer of wind energy projects we are excited to be playing a part in the evolution of renewables in Tasmania. We make the following observations on the Plan:

Overarching comments

The '*Battery of the Nation*' and '*Project Marinus*' are vital to meeting the 200% Renewable Energy Target in Tasmania. Establishing renewable hydrogen production and attracting additional energy-intensive

industries have potential to leverage the benefits of large increases in renewables, but it is Marinus that brings all the parts together.

Priority should be given to providing early clarity over the process to approval of each of these, and particularly Marinus. A series of measurable, timed stages would enable all industry participants to make their own plans and ultimately help to deliver lower risk and lower cost outcomes around generation and transmission investments.

It is vital that to encourage all the private investment required in the many wind energy projects across the State that there is open market access to the NEM through the Marinus Link. An early and unequivocal statement on this would be beneficial.

Specific comments

Priority 1 *"Transforming Tasmania into a global renewable energy powerhouse"* sets out the interim target for 2030 and the 2040 '200%' target. We welcome the ambition in these figures and agree that while large they have a solid and credible basis.

Setting one or 2 additional interim targets (for example, 2025) would provide a basis for a periodic review of the Plan and progress against it and provide a basis for adjustment or additional actions.

Priority 2 *"Renewable Energy for the community"* with its focus on ensuring regulated electricity prices remain affordable with a target of the lowest prices on the National Energy Market by 2022 will no doubt assist in this essential messaging.

We have enjoyed meeting and working with communities around Tasmania. We have found that people are very willing to share their experience and views on energy, and sometimes that there is not a high level of awareness of plans and actions and of energy policy. Therefore, we strongly support the commitment to community engagement and exploration of benefit sharing described in Priority 2.

Priority 3 "*Growing economy and jobs*" focuses on growing the Tasmanian renewable energy brand nationally and globally, attracting new load to Tasmania and creating thousands of new jobs through the draft Renewable Action Plan process. Queensland, with zero cost power during the day due to the scale of its installed solar plants is also intent upon enticing energy intensive industries. The natural advantage Tasmania will have under 200% renewables is the 24/7 capacity to deliver that lower cost power to energy intensive industries.

Epuron is supportive of the Plan. By seizing Tasmania's immense potential, renewable energy can grow Tasmania's economy, attract investment, create jobs and support Australia's transition to renewable supply. We look forward to engaging further with the Department of State Growth on the exciting renewable energy opportunities in Tasmania.

Please do not hesitate to contact us if we can provide any further information.

Yours sincerely,

Martin Poole
Executive Director

Epuron Background

Epuron has been developing solar and wind energy projects in Australia since 2003. Our track record of renewable energy development in Australia is second to none. Our experience stretches from site identification, through all phases of development and into construction and operation. Epuron's primary focus is as an independent developer where completed development projects are transferred an investor at the capital investment stage.

Epuron is a founding signatory to the Clean Energy Council's Best Practice Charter for Renewable Energy Developments. We commit to honouring the Best Practice Charter in our renewable energy projects. We work closely with local communities and key stakeholders to provide broad social and environmental benefits.

Epuron is proudly Australian owned, and well placed to continue its success in developing solar and wind energy projects across the country.

Our completed projects include:

- Cullerin Range Wind Farm (30MW, NSW, built by Origin Energy)
- Gullen Range Wind Farm (165MW, NSW, built by Goldwind)
- White Rock Wind Farm (119 turbines, NSW, 175MW Stage 1 built by Goldwind)
- Silverton Wind Farm (598 turbines, NSW, 200MW Stage 1 built by AGL)
- Coppabella Wind Farm (79 turbines, NSW, sold to Goldwind, pre-construction)
- Rye Park Wind Farm (92 turbines, NSW, sold to Tilt Renewables, planning being modified ready for construction)
- Clermont Solar Farm (90MWp, QLD, built by Wirsol)
- Nevertire Solar Farm (130MWp, NSW, built by Elliot Green Power)
- Katherine Solar Farm (32MWp, NT, built by ENI Australia)
- Liverpool Range Wind Farm (267 turbines, NSW, sold to Tilt Renewables)
- TKLN Solar Farm (1MWp, NT, designed, built, owned and operated by Epuron)
- Uterne Solar Farm (4MWp, NT, owned and operated by Epuron)
- Yulara Solar Farm (1.8MWp, NT, designed, built, owned and operated by Epuron).

Epuron has been assessing Tasmanian opportunities since 2008 and began active development in 2014. We have identified several highly prospective sites which share some key characteristics:

- Excellent wind resources, and good solar resources;
- Access to existing grid infrastructure – all projects bar one have grid connection point on site;
- Strong landowner interest and general community support;
- Few and manageable environmental constraints.

Epuron's current Tasmanian developments include:

- George Town Solar Farm (6MWp, planning approved, grid approved)
- Wesley Vale Solar Farm (15MWp, planning approved, grid advanced)
- Western Plains Wind Farm (50MW, planning submission imminent, grid advanced)
- Hellyer Wind Farm (~150MW, planning studies commencing, 110kV connection proposed)
- Guildford Wind Farm (~300MW, planning studies commencing, 220kV connection proposed)
- St Patricks Plains Wind Farm (~300MW, planning studies in progress, 220kV connection proposed).